

ABC Coke

3rd Party LDAR Audit Scope



PPM Consultants, Inc. (PPM) was procured by ABC Coke (ABC) to perform their initial Consent Decree (CD) third party audit. The following information summarizes the general scope of the audit including team, schedule, communication expectations, health and safety, information to be review, and comparative monitoring and analysis.

Audit Team

<u>Role</u>	<u>Personnel</u>	<u>Responsibility</u>
Lead Auditor	Brandon Bass, P.E.	Audit Team Management, Database Records Review, Monitoring technician Observations,
Comparative Monitoring	Jeb Burttram	Field Comparative Monitoring
	Brandon Williams	Field Comparative Monitoring
Remote Audit Support	Ned Coleman, P.E	Database Records Review (As Needed)
Senior Manager / Oversight	Zane G. Hood, Jr. P.E.	LDAR Program Management, Audit Team Oversight, Audit Support as Needed.

Schedule

- Audit Dates: May 10, 2021 to May 21, 2021
- Hours: Onsite for 9 Hour Days
- Time: Proposed 7:30 am to 4:30 pm (Can be updated as needed)

Communication Expectations

PPM will maintain an open and construction dialogue with the ABC and Think Environmental staff. Any questions or concerns that may arise will be discussed as quickly as possible in an attempt to identify the root cause of concern. PPM will be prepared to hold a brief end of day summary meeting to review any findings or open questions from the day, as well as review the list of any outstanding questions should ABC choose to do so.

Health and Safety

- Site Specific training required; to be completed Monday Morning after kick off meeting.
- PPE Required:
 - Hard Hat
 - Safety Glasses
 - Ear Plugs
 - Fire Protectant Clothing (FRCs)
 - Steel Toe Boots

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LDAR Information to be Reviewed

Based on the requirements of the CD in Appendix A, Paragraph 23, PPM will be reviewing the following:

- Compliance with all applicable LDAR regulations, including compliance with the more stringent leak definitions as defined in the CD, Appendix A, Table 1,
- Verification of Monitoring Frequency,
- Field tagging review,
- Verification of covered equipment in benzene service is included with the LDAR program,
- DOR procedure and documentation,
- Repair procedures, follow up verification monitoring, and documentation,
- Technician monitoring data trend analysis,
- Precision and routine calibration monitoring procedures and records,
- Observation of LDAR monitoring technicians,
- Ensuring compliance with the comparative monitoring analysis required by the CD, and
- Any other LDAR required records to be maintained.

Comparative Monitoring and Analysis

As required by Appendix A, Paragraph 24 of the CD, PPM will perform comparative monitoring on **no less than 50% of the covered LDAR equipment** at the facility.

- Leak Percentage Calculation
 - PPM will calculate a leak percentage broken down by equipment type (valves, pumps, etc.)
 - The leak percentages of the previous year shall be used to determine the historic average leak percentage from prior monitoring events.
 - If the historic average leak percentage is zero, for the purposes of the comparison calculation, it shall be assumed that one leaking piece of equipment was found within the past year.
 - For this first CD required LDAR audit, OELs are not required to be comparatively monitored because of the unavailability of historic leak percentages.
 - The comparative monitoring results shall be used to calculate an audit leak percentage for each type of covered equipment
- Leaker Comparison Analysis
 - The audit leak percentage and the historical leak percentage will be compared on an equipment level basis.
 - PPM will calculate the comparative monitoring leak ratio by dividing the audit leak percentage by the historical leak percentage. A program deficiency is documented if:
 - The comparative monitoring leak ratio is ≥ 3.0 , *and*
 - The audit leak percentage is ≥ 1.0 .